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Attorneys for Plaintiff

E-Filing

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SIERRA CLUB,

Plaintiff,

v.

UNITED STATES ENVIRONMENTAL
 PROTECTION AGENCY,

Defendant.

No. C 06-5288 MHP

STIPULATION TO THE ENTRY OF AN
 ORDER EXTENDING TIME FOR
 PLAINTIFF SIERRA CLUB TO FILE
 MOTION FOR COSTS AND FEES

Pursuant to Local Rules 6-2 and 7-12, Plaintiff Sierra Club and Defendant United States Environmental Protection Agency ("EPA"), by and through their undersigned counsel, hereby stipulate the entry of an order that extends by 45 days – to August 20, 2007 – Sierra Club's deadline for filing a motion for its costs and fees. The deadline for filing such motion is set forth at paragraph 7 in this matter's May 10, 2007 consent decree (Doc. No. 18).

The parties believe the additional time will be sufficient for them to determine whether this final matter can be resolved amicably. No previous requests for extensions of the decree's deadline have been sought. There are no other matters scheduled in this case, therefore this stipulated extension will not affect any other deadlines.

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1 FOR PLAINTIFF SIERRA CLUB:

2
3 s/ Reed Zars

Dated: July 6, 2007

4 REED ZARS

5 Attorney at Law

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10 FOR DEFENDANT EPA:

11 s/ Pamela S. Tonglao

Dated: July 6, 2007

12 PAMELA S. TONGLAO

13 United States Department of Justice

14 Environment & Natural Resources Division

15 Environmental Defense Section

16 P.O. Box 23986

17 Washington, D.C. 20026-3986

18 (202) 305-0897

19 Fax: (202) 514-8865

20 pamela.tonglao@usdoj.gov

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 July 6, 2007

23 DATED

24 UNITED STATES DISTRICT JUDGE

25 CERTIFICATE OF SERVICE

26 I hereby certify that a true and correct copy of the foregoing STIPULATION TO THE
27 ENTRY OF AN ORDER TO EXTEND TIME FOR PLAINTIFF SIERRA CLUB TO FILE
28 MOTION FOR COSTS AND FEES was filed electronically. Notice of this filing will be sent by
operation of the Court's electronic filing system to all parties indicated on the electronic filing
receipt.

29 July 6, 2007

30 s/ Reed Zars

Reed Zars